SM ROCHA, LLC
TRAFFIC & TRANSPORTATION ENGINEERING

September 11, 2026

Todd Womack
LASCO Development Corporation
1207 Antoine Drive
Houston, Texas 77055

RE: Legacy Hill & Bradley 7-Eleven / Traffic Generation Analysis
El Paso County, Colorado
PCD File No. PPR2614

Dear Todd,

SM ROCHA, LLC is pleased to provide traffic generation information for the development entitled Legacy Hill & Bradley 7-Eleven. This development is located on the southwest corner of the intersection of Bradley Road and Legacy Hill Drive in El Paso County, Colorado

This traffic generation analysis letter has been revised to address County review comments made to the March 2026 version regarding an evaluation of intersection sight distance and access spacing requirements along the future Basin Grove one-way private drive.

The intent of this analysis is to present traffic volumes likely generated by the proposed development, provide a traffic volume comparison to previous land use assumptions approved for the development site, and consider potential impacts to the adjacent roadway network. This analysis was prepared in accordance to Section B.1.2.D of the County's Engineering Criteria Manual[1].

The following is a summary of analysis results.

Site Description and Access

Land for the development is currently vacant and surrounded by a mix of industrial and residential land uses.

The proposed development is understood to entail the new construction of an approximate 4,700 square foot 7-Eleven gas station convenience store supporting 10 fueling positions.

[1] El Paso County Engineering Criteria Manual, El Paso County, January 9, 2025.

The previously approved Waterview East Commercial Traffic Impact and Access Analysis[2] assumed development of a gas station convenience store with 12 fueling positions in the same development area as currently proposed with this project.

Sight Distance and Access Spacing

Proposed access to the overall commercial area is general and provided through one right-in-only access from Legacy Hill Drive onto a shared one-way commercial drive (referred to as Basin Grove) and one full-movement access onto the future westerly extension of Frontside Drive. Direct access to the development site is provided via two right-in / right-out access drives onto Basin Grove spaced approximately 175 feet apart.

Pursuant to Section B.2.4.D of the County's ECM, an assessment of the appropriateness of proposed access locations was completed.

The Waterview East-Commercial Preliminary Plan (Amendment) shows a private drive designation and cross-section for the future Basin Grove one-way access. As such, a posted speed limit of 25 MPH is expected for Basin Grove. Therefore, in reference to Table 2-35 of the ECM, minimum entering sight distance requirements of 325 feet are required along Basin Grove, a two-lane roadway designed to accommodate single-unit trucks.

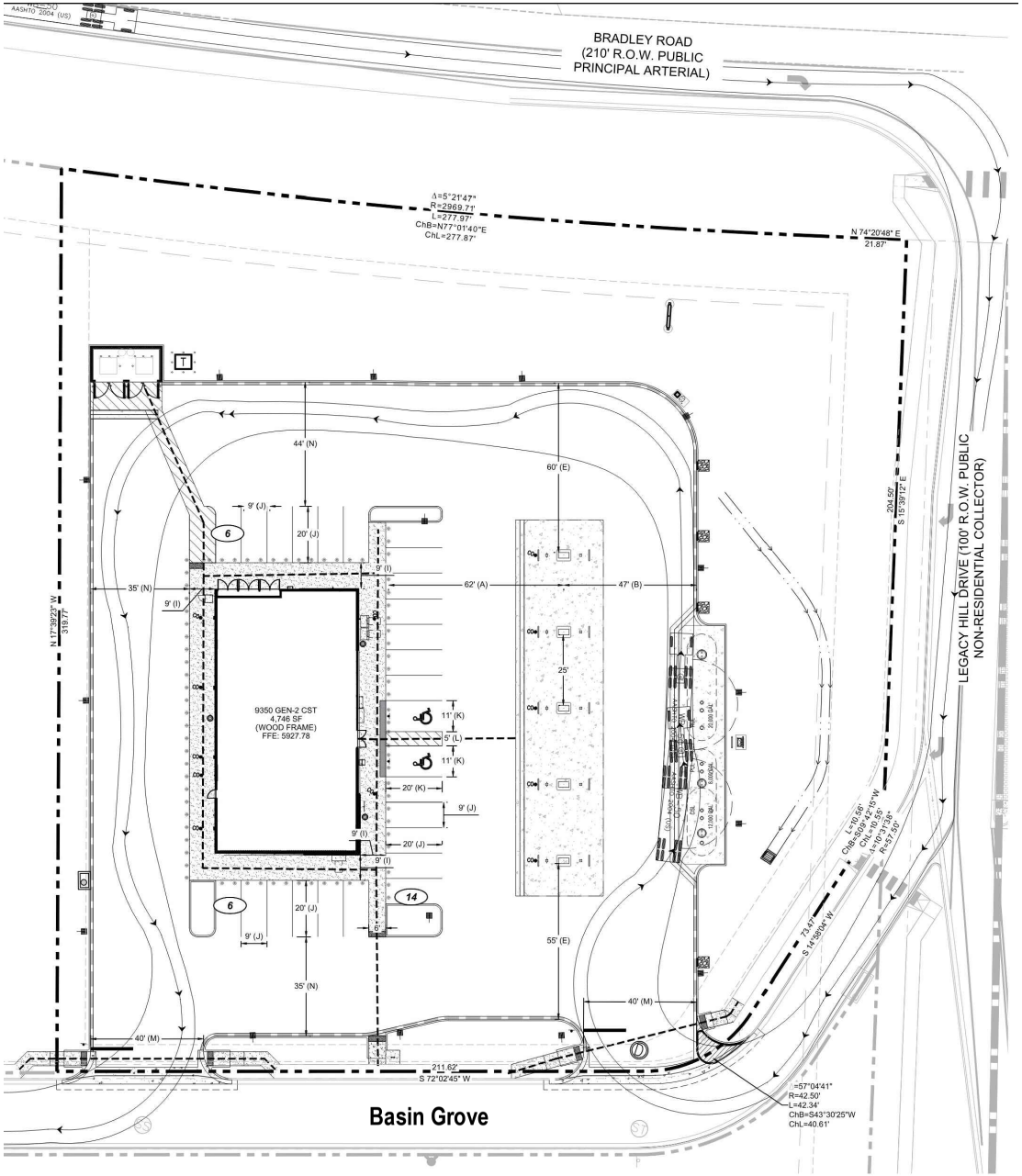
A conceptual sight distance exhibit illustrating approximate intersection sight distance triangles is included for reference in Attachment A.

General site and access locations are shown on Figure 1.

A site plan, as prepared by K2 Civil Consultants, is shown on Figure 2. This plan is provided for illustrative purposes only.

[2] Waterview East Commercial: Traffic Impact and Access Analysis, LSC Transportation Consultants, Inc., September 12, 2023.


North
Not to Scale
State Highway 21
Development Site
Bradley Road
Foreign Trade Zone Boulevard
Markshefter Road
Frontside Drive
Legacy Hill Drive
Bradley Landing Road


BRADLEY ROAD
(210' R.O.W. PUBLIC
PRINCIPAL ARTERIAL)
Δ=5°21'47"
R=2969.7'
L=277.97'
ChB=N77°01'40"E
ChL=277.87'
N 74°20'48" E
21.87'
LEGACY HILL DRIVE (100' R.O.W. PUBLIC
NON-RESIDENTIAL COLLECTOR)
204.59'
S 15°39'22" E
N 17°39'23" W
319.77'
44' (N)
60' (E)
9' (J)
20' (J)
9' (I)
35' (N)
62' (A)
47' (B)
25'
9350 GEN-2 CST
4,746 SF
(WOOD FRAME)
FFE: 5927.78
11' (K)
5' (L)
20' (K)
9' (J)
20' (J)
55' (E)
40' (M)
211.62'
S 72°02'45" W
Basin Grove
Δ=57°04'41"
R=42.50'
L=42.34'
ChB=S43°30'25"W
ChL=40.61'
S 14°58'04" W
73.47'
ChB=S09°22'15"W
ChL=10.58'
Δ=10°11'36"
R=57.50'
North
Not to Scale

Vehicle Trip Generation

Standard traffic generation characteristics compiled by the Institute of Transportation Engineers (ITE) in their report entitled Trip Generation Manual, 12th Edition, were applied to the proposed land use in order to estimate the average daily traffic (ADT) and peak hour vehicle trips. A vehicle trip is defined as a one-way vehicle movement from point of origin to point of destination.

The previously approved Waterview East Commercial traffic study used trip generation rates from ITE's Trip Generation Manual, 11th Edition, and included "Gasoline/Service Station with Convenience Market" land use in the same development area as currently proposed with this project.

Table 1 presents average trip generation rates for the proposed development area. Use of average trip generation rates presents a conservative analysis. ITE land use code 945 (Convenience Store/Gas Station (4-5.5k)) was used for analysis because of its best fit to the proposed land use.

Table 1 – Trip Generation Rates

			TRIP GENERATION RATES						
ITE			24	AM PEAK HOUR			PM PEAK HOUR		
CODE	LAND USE	UNIT	HOUR	ENTER	EXIT	TOTAL	ENTER	EXIT	TOTAL
945	Convenience Store/Gas Station (4-5.5k)	VFP	203.49	10.15	9.76	19.91	9.58	9.58	19.15

Key: VFP = Vehicle Fueling Positions.
Note: All data and calculations above are subject to being rounded to nearest value.

Table 2 summarizes the projected ADT and peak hour traffic volumes likely generated by the land use area proposed and provides comparison to traffic volume estimates for the previously approved land use.

Table 2 – Trip Generation Summary

			TOTAL TRIPS GENERATED						
ITE			24	AM PEAK HOUR			PM PEAK HOUR		
CODE	LAND USE	SIZE	HOUR	ENTER	EXIT	TOTAL	ENTER	EXIT	TOTAL
Site Development - Previously Approved *									
945	Gasoline/Service Station with Convenience Market	12 VFP	4,149	190	190	380	161	161	322
	Previously Approved Total:		*4,149*	*190*	*190*	*380*	*161*	*161*	*322*
Site Development - Proposed									
945	Convenience Store/Gas Station (4-5.5k)	10 VFP	2,035	102	98	199	96	96	192
	Proposed Total:		*2,035*	*102*	*98*	*199*	*96*	*96*	*192*
	Difference Total:		***-2,114***	***-88***	***-92***	***-181***	***-65***	***-65***	***-131***

Key: VFP = Vehicle Fueling Positions.
* = Waterview East Commercial: Traffic Impact and Access Analysis, LSC Transportation Consultants, Inc., September 12, 2023
Note: All data and calculations above are subject to being rounded to nearest value.

As Table 2 shows, the proposed development area has the potential to generate approximately 2,035 daily trips with 199 of those occurring during the morning peak hour and 192 during the afternoon peak hour. Table 2 further shows how proposed development traffic volumes do not exceed that approved within the Waterview East Commercial traffic study.

Adjustments to Trip Generation Rates

While a development of this type is likely to attract trips from within area land uses as well as pass-by or diverted link trips from the adjacent roadway system, no trip reduction was taken in this analysis. This assumption provides for a conservative analysis.

As example, published ITE pass-by trip data indicates an average trip generation reduction rate between 75 and 76 percent as typical to gas stations with a convenience store. Considering the lowest reduction percentage, primary trip generation for the proposed development equates to three-quarters of trip generation volumes presented in Table 2. A primary trip is defined by ITE as a trip made for the specific purpose of visiting the destination generator.

Vehicle Trip Generation Comparison & Development Impacts

As Table 2 shows, the proposed development does not exceed traffic volumes in comparison to previously projected volumes approved for the overall development area. These volumes are not likely to negatively impact operations of Legacy Hill Drive nor other adjacent roadways or intersections.

Conclusion

This analysis assessed traffic generation for the Legacy Hill & Bradley 7-Eleven development, provided a traffic volume comparison to previous land use assumptions approved for the development site, and considered potential impacts to the adjacent roadway network.

It is our professional opinion that the proposed site-generated traffic is expected to create no negative impact to traffic operations for the surrounding roadway network and proposed overall site access drives, nor at the Legacy Hill Drive intersection with Bradley Road, and is in compliance with the Waterview East Commercial Traffic Impact and Access Analysis.

We trust that our findings will assist in the planning and approval of the Legacy Hill & Bradley 7-Eleven development. Please contact us should further assistance be needed.

Sincerely,

SM ROCHA, LLC
Traffic & Transportation Engineering

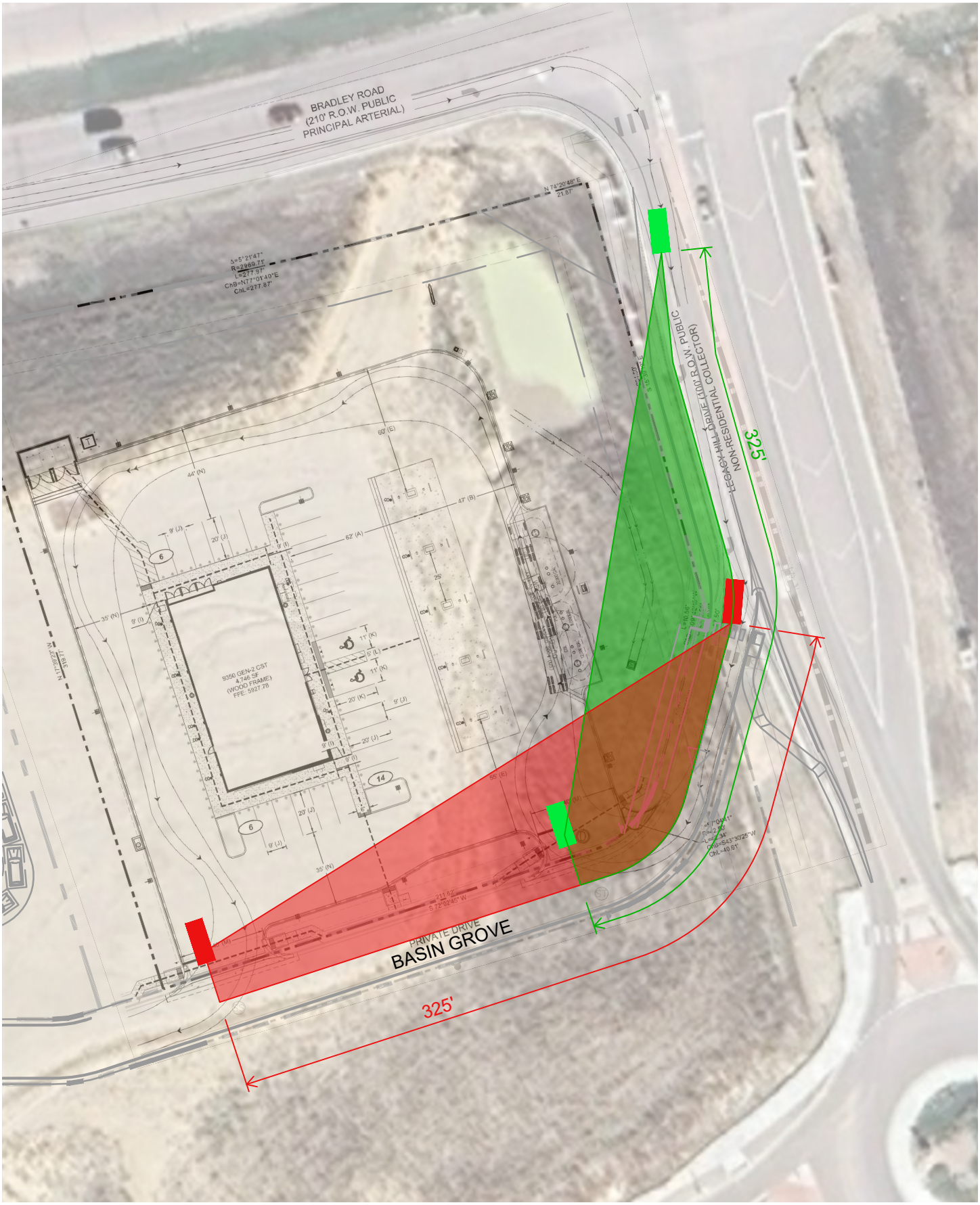
Leo Ornelas, EIT
Traffic Engineer



Fred Lantz, PE
Senior Traffic Engineer

ATTACHMENT A

Conceptual Sight Distance Exhibit
Truck Turning Templates

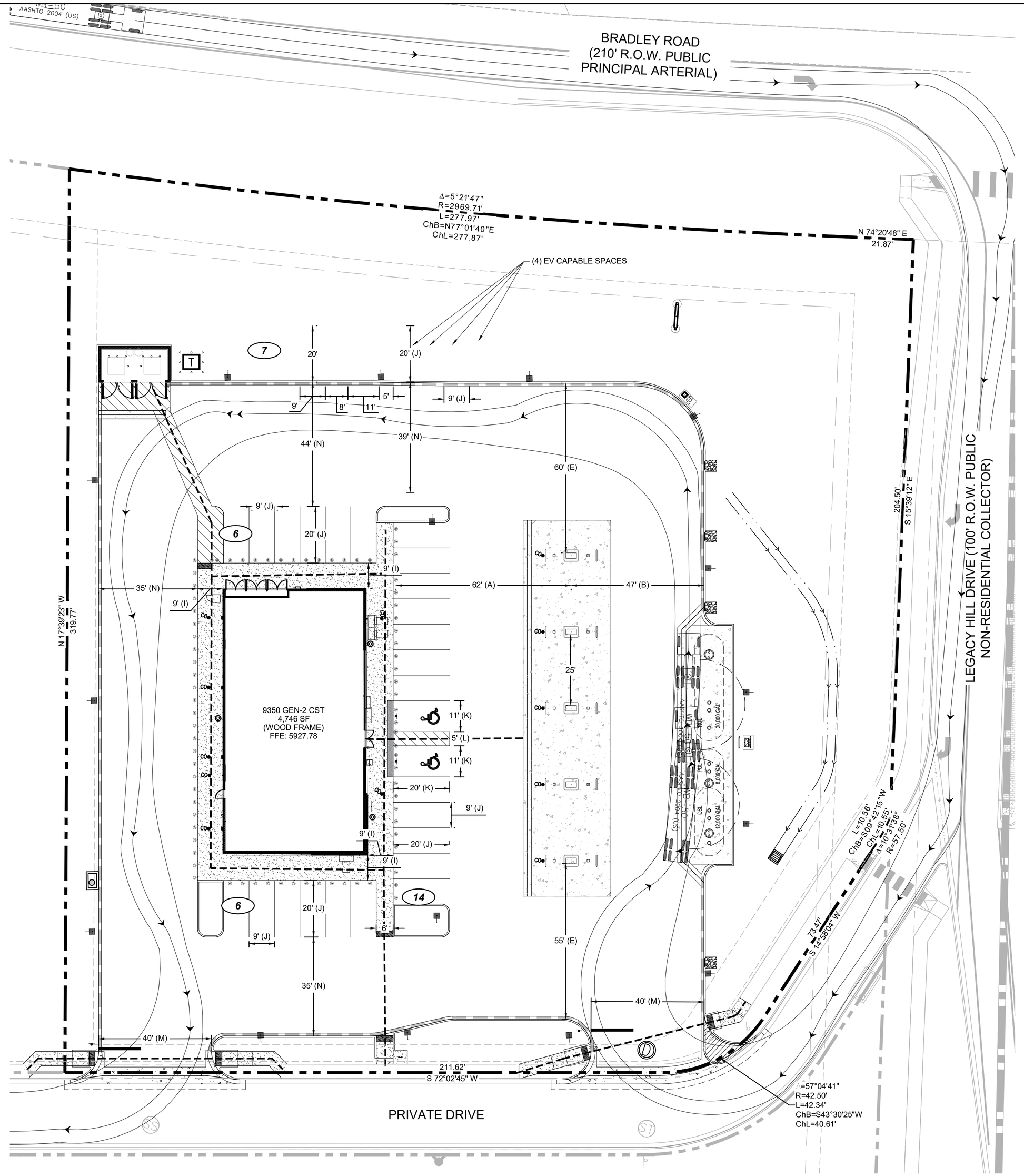


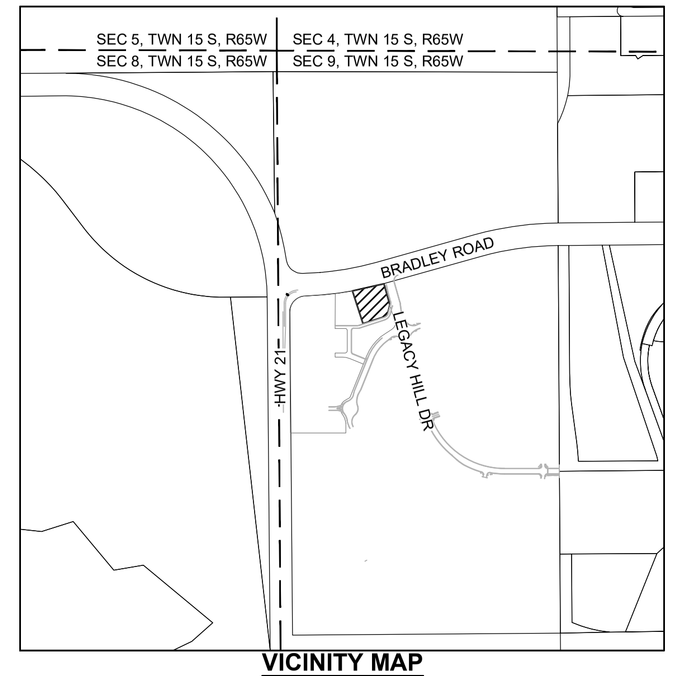
LEGACY HILL & BRADLEY 7-ELEVEN
Conceptual Sight Distance Exhibit

SM ROCHA, LLC
Traffic & Transportation Engineering

September 2026

© 2026, ALL RIGHTS RESERVED.





VICINITY MAP
SCALE: 1" = 1000'

SITE PLAN LEGEND

- PROPOSED PROPERTY BOUNDARY
- PROPOSED EASEMENT
- PROPOSED BUILDING SETBACK
- PROPOSED BUILDING OUTLINE
- PROPOSED BUILDING OVERHANG
- EXISTING CURB AND GUTTER
- PROPOSED CATCH CURB AND GUTTER
- PROPOSED SPILL CURB AND GUTTER
- PROPOSED WALL
- PROPOSED SIDEWALK
- DENOTES ADA ROUTE
- PARKING COUNT
- PROPOSED CONCRETE PAVEMENT

Know what's below. Call before you dig.

CALL UTILITY NOTIFICATION CENTER OF COLORADO
1-800-922-1987 or 811
CALL 3-BUSINESS DAYS (NOT INCLUDING INITIAL DAY OF CONTACT) IN ADVANCE BEFORE YOU DIG, GRADE, OR EXCAVATE FOR THE MARKING OF UNDERGROUND MEMBER UTILITIES.

PROJECT BENCHMARK

COLORADO SPRINGS UTILITY (FIMS) MONUMENT F206
A BERNTSEN TOP SECURITY MONUMENT SYSTEM WITH A 3.5 INCH DIAMETER ALUMINUM CAP IN A ROAD BOX, LOCATED AT THE NORTHWEST CORNER OF FONTAINE BOULEVARD AND POWERS BOULEVARD (NOW HIGHWAY 21)
ELEVATION - 5897.89' (NGVD 1929)

SCALE IN FEET
0 20 40
1" = 20'
IF BAR DOES NOT MEASURE 1 INCH THEN DRAWING IS NOT TO SCALE

PLANNING AND COMMUNITY DEVELOPMENT DIRECTOR STAMP
PCD FILE NO. PPR-2614

K2 CIVIL CONSULTANTS

PRELIMINARY NOT FOR CONSTRUCTION

MAJOR SITE DEVELOPMENT PLAN
7-ELEVEN - STORE #42975
SITE #1057022
BRADLEY ROAD AND LEGACY DRIVE
FUEL TRUCK ROUTE

No.	REVISION	BY	DATE

PROJECT NO:	LAS008.01
DESIGNED BY:	MRD
REVIEWED BY:	MRD
DATE:	04/24/2026

C0.3

P:\LAS\CO\CO. EL PASO COUNTY - BRADLEY RD AT LEGACY HILL\08 CAD\EXHIBITS\7-ELEVEN SITE PLAN.DWG - Michael Diego - 9/8/2025 9:23:16 AM